

## **BELL ATLANTIC RESPONSE TO MA DTE KPMG EXCEPTION**

**Exception #:** #9

**Component:** Bell Atlantic has used a formula and data and excluded certain data from the calculation metric creating misleading performance results inconsistent with the February 28, 2000 New York Carrier-to-Carrier Guidelines.

**Domain:** Metrics

**Date Uncovered by KPMG:** 05/09/00

**Date BA Received:** 05/09/00

**Date BA Responded:** 5/17/00

**KPMG Summary Statement and BA Response:** **KPMG: If the Bell Atlantic's metric creation practice does not comply with the February 28, 2000 New York Carrier-to-Carrier Guidelines the reported performance does not reflect the actual operation being measured.**

### **Issue 9.1**

#### **KPMG –**

Bell Atlantic's calculation of the PO-3-02 Contact Center Availability metric is not consistent with the formulation required by the February 28, 2000 New York Carrier-to-Carrier Guidelines.

The compliance filing requires that the PO-3-02 metric, "percent of calls answered within thirty seconds," is a percentage adjusted for the number of busy and abandoned calls. The numerator of the metric is the "count of calls answered within 30 seconds of call received by the ACD." The denominator of the metric is the "total calls answered in ordering center plus 15% of abandoned calls plus 10% of busy calls."

However, the denominator of all PO-3-02 metric calculations through February 2000 does not include abandoned or busy calls.

#### **5/17/00 Bell Atlantic Response -**

KPMG is correct in this finding. The TISOC has instituted a correction immediately to include the abandoned calls. For Busy calls, they are working with the ACD vendor to ensure that busies are captured appropriately in the denominator.

### **Issue 9.2**

#### **KPMG –**

Bell Atlantic calculated PO-2 metrics (OSS Interface Availability) based on aggregate spreadsheet data, while the New York Carrier-to-Carrier Guidelines mandate that the calculation be based on the Enview log files.

In the New York February 28, 2000 Carrier to Carrier Guidelines,

the PO-2 “methodology” section states that, “Bell Atlantic will use Enview as a means of monitoring all BA systems, including retail OSS. However, BA will measure reported outages, based on actual reported time frames as well as any outages captured by Enview and not reported by CLECs.”

“Enview measurement of availability of the EDI interface will be as follows: the mechanized OSS interface availability process is based on the transaction created by the Enview Robots. The program determines whether the transactions are successful or unsuccessful, or that no transactions are issued (not polled).”

KPMG received data and algorithms for calculation of PO-2 metrics in Excel spreadsheet format. The data are aggregated monthly by interface. The metrics are then calculated based on these aggregated data. As of February 2000, the outages captured by Enview are not included in the metrics.

**5/17/00 Bell Atlantic Response -**

The calculation of this metric does include the Enview data. BA assumes that KPMG made this statement because they did not receive the Enview files with the Excel spreadsheet that contains the aggregate numbers. BA submitted the January and February Enview files to KPMG on 5/16/00 and will work with KPMG to resolve metrics replication issues.

**Issue 9.3**

**KPMG –**

Bell Atlantic’s calculation of the PO-3 Contact Center Availability metric through February 2000 does not include all call centers “supporting CLECs for ordering, provisioning, maintenance and billing issues” required by the February 28, 2000 New York Carrier-to-Carrier Guidelines.

Bell Atlantic had confirmed that the Order Entry Help Desk, Billing and Collections Center and the System Administration Center are not included in the PO-3 metric calculations. The February 28, 2000 New York Carrier-to-Carrier Guidelines require that the average speed of answer and the percent answered within thirty seconds be measured for these ordering centers.

**5/17/00 Bell Atlantic Response -**

Bell Atlantic is abiding by the Carrier Guidelines with respect to the call center calls included. The Carrier Guidelines for PO-3 refer to hours of operation for all functions and the reported speed of answering for calls placed to the order processing 800 number. The guidelines state that performance is measured for calls placed to the order processing 800 number and for calls where the CLEC presses 0. The guideline languages is below and bold for these specifics:

**“Speed of Answer** – CLEC centers. Measured for Ordering and Repair queues. Reported out of the Automated Call Distributor (ACD). Speed of Answer measure includes calls that go to the main number in the center, either directly or from overflow (CLECs choosing the option of the main number).

Note: consistent with proposed end user standard, % within 30 seconds includes 15% of Abandons and 10% of busy signal in denominator.

Speed of Answer is measured in seconds from the time a call enters the BA ACD until it is answered by a representative. CLECs have the choice of **calling the order processing 800 number**, in which case the call is directed to the next available representative through an ACD. Alternatively, CLECs can call their dedicated representatives on the representative's direct line. If the representative is unavailable, the CLEC can leave a voice mail or press 0 and be transferred to the pool of representatives. BA measures the speed of answer for **calls to the 800 number and for calls where the CLEC presses 0** to speak to the next available representative. For calls to the 800 number, the measurement begins when the call enters BA's ACD; for calls to a dedicated representative, the measurement begins when the CLEC presses 0. In each case, the measurement ends when the call is answered by a representative."

#### **Issue 9.4**

##### **KPMG –**

The New York State Carrier-to-Carrier Guidelines specify that PR-6 metrics measure Installation Quality using time constraints in both the numerator and denominator—troubles reported within a specific number of days from order completion.

Bell Atlantic is currently measuring the denominator by identifying installation activity within a specific month, or on a fixed-month basis. Meanwhile, the numerator is measuring troubles reported within either 7 or 30 days of order completion, or on a rolling-month basis. Hence, the numerator and denominator values are based on time periods that are not aligned.

##### **5/17/00 Bell Atlantic Response -**

The metrics tested in NY are identical to the metrics tested in Massachusetts for these metrics. No definitional change has occurred since the NY test, other than product disaggregation. It is apparent that the language in the metric is unclear and requires clarification. The performance includes activity within the report month. Troubles reported during the month on lines that had installation activity within 7 or 30 days PRIOR to the trouble report is included in the numerator. Lines worked within the calendar month is included in the denominator. Retail, Resale and UNE are all calculated in the same fashion. To clarify the guidelines, BA will issue a request to the Carrier Working Group in NY to clarify the guidelines such that they are consistent with the metric actually being calculated. The guidelines imply that BA reviews orders in a month and looks out 30 days after the order was completed for a trouble report on the line. In order to meet that language literally, BA would have to delay the performance reports by one month in this metric to allow the full 30 days to expire on orders completed during a calendar month. BA believes that the correct action is to modify the guidelines.

